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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE HERTZ CORPORATION,)	Case No.: 2:20-cv-01561-APG-BNW
)	
Plaintiff,)	STIPULATION TO PERMIT FOR
)	DISCOVERY TO BE COMPETED
vs.)	BEYOND THE DISCOVERY DEADLINE
)	
MARCOS LEON-SANCHEZ, et al.,)	
)	
Defendants.)	

Plaintiff The Hertz Corporation ("Hertz") and Defendant Eroddys Carrillo Diaz ("Diaz"), by and through counsel, stipulate and agree as follows:¹

WHEREAS, this matter involves an insurance coverage dispute involving claims arising from multiple vehicle accidents in which Hertz has alleged that the accidents may have been staged;

WHEREAS, the current deadline to complete discovery is April 1, 2022;

WHEREAS, this Court, in connection with an Application for Contempt Orders [Dkt. No. 40] that Hertz filed, recently granted the motion in part and directed counsel for Hertz to attempt to reschedule the depositions of third party witnesses Katherin Valdes Garcia ("Garcia") and Marcos Leon Sanchez ("Sanchez") while separately scheduling a hearing on an Order to Show Cause for May 23, 2022 [Dkt. No. 49];

WHEREAS, the depositions of third party witnesses Yanier Dieguez ("Dieguez"); Haydee

¹ While the First Amended Complaint [Dkt. No. 12] names other parties as defendants, none have appeared such that Hertz and Diaz are the only parties to this case.

1 Villazan ("Villazan") and Rommel Dolmusmunguia ("Rommel") could not be completed as none of
2 the individuals could be located so as to serve each with subpoenas;

3 WHEREAS, the deposition of Diaz has not yet been completed;

4 WHEREFORE, the parties stipulate and agree to permit for the depositions of Diaz, Garcia
5 and Sanchez to be taken up until May 22, 2022.

6 IT IS SO AGREED.

7 Dated: April 4, 2022

8 MORALES FIERRO & REEVES

TANNER CHURCHILL ANDERSON

9
10 By /s/ William C. Reeves
11 William C. Reeves
Attorneys for Plaintiff

By /s/ Jared B. Anderson
Jared B. Anderson
Attorneys for Defendant

12
13 **ORDER**

14 **IT IS SO ORDERED**

15 **DATED:** 1:53 pm, April 05, 2022

16 

17 **BRENDA WEKSLER**
18 **UNITED STATES MAGISTRATE JUDGE**
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